

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DOCKET NO: 04 11572 JLT

SUSAN COONEY,
Plaintiff,

v.

HUMANISTIC PSYCHOLOGY
INSTITUTE, d/b/a SAYBROOK
INSTITUTE and MAUREEN O'HARA,
Individually,
Defendants.

**MOTION TO AMEND NOTICE OF PRO HAC VICE
APPEARANCE OF MICHAEL VARTAIN**

The defendants move to amend the pro hac vice appearance by Attorney Michael Vartain. Defendants would like to clarify that Attorney Michael Vartain, as pro hac vice counsel, should only be listed as counsel for defendant Humanistic Psychology Institute, d/b/a/ Saybook Institute, and not for defendant, Maureen O'Hara, in the above-entitled case.

Respectfully Submitted,

Attorney for Defendants,
Humanistic Psychology Institute, d/b/a/ Saybook
Institute and Maureen O'Hara

/s/ Grace V. Bacon Garcia

Grace V. Bacon Garcia, BBO #640970
MORRISON MAHONEY LLP
250 Summer Street
Boston, MA 02210
(617) 439-7500

Defendant,
Humanistic Psychology Institute, d/b/a/ Saybook
Institute
Admitted Pro Hac Vice,

/s/Michael J. Vartain

Michael J. Vartain
Vartain Law Group
601 Montgomery Street
San Francisco, California

Date: January 30, 2006

Fed R. Civ. P. 37(a)(2)(A) and Local Rule 7.1(A)(2) and Local Rule 37.1 Certification

I, Grace V. Bacon Garcia, Esquire, counsel for the defendants hereby certify that, pursuant to Fed R. Civ. P. 37(a)(2)(A) and Local Rules 7.1(A)(2) and 37.1, I conferred with plaintiff's counsel, Attorney Paul Morenberg, on January 28 and 30 2006 by electronic mail. In addition, on January 30, 2006, I conferred further on this issue with Attorney Morenberg by telephone. Despite an attempt in good faith to resolve the issue presented by the within Motion and we were unable to do so.

/s/ Grace V. Bacon Garcia

Grace V. Bacon Garcia

CERTIFICATE OF SERVICE

I certify that this document has been served upon all counsel of record in compliance with the F.R.C.P.

/s/ Grace V. Bacon

Grace V. Bacon

Date: January 30, 2006